

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,
ex rel. MICHAEL GILL, *et al.*,

Plaintiffs,

v.

CVS HEALTH CORP., *et al.*,

Defendants.

Civil Case No. 18-cv-06494

HON. STEVEN C. SEEGER

HON. DANIEL P. MCLAUGHLIN

JOINT SETTLEMENT STATEMENT

Pursuant to the Court’s Minute Order issued on September 9, 2024, (Docket Index 346) (the “Order”) counsel for Plaintiff-Relator Michael Gill and Plaintiff State of Delaware (“Plaintiffs”), along with counsel for the CVS Defendants (“Defendants”) submit this joint statement detailing their positions on resolution of the case.

Pursuant to the Order, the parties have exchanged settlement offers and demands; lead counsel for Plaintiffs and Defendants subsequently met and conferred regarding these offers and demands on October 16, 2024.

Plaintiffs’ Position

While acknowledging a wide difference between Plaintiffs’ demands and Defendants’ offer, the Plaintiffs believe that a mediation conference would be helpful in providing the parties a neutral case assessment and in moving the parties toward resolving the claims in the matter.

Defendants’ Position

Defendants do not believe a mediation will be a productive use of the parties’ time and resources at this point, and would only detract from the parties’ focus that should be on expert

discovery and summary judgment. To say the parties have a “wide difference” in their respective settlement-offer and settlement-demand is a significant understatement.

DATE: October 18, 2024

Respectfully submitted,

/s/ Dan Hergott

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon all counsel of record via the Court's electronic filing system on October 18, 2024.

/s/ Dan Hergott

Counsel for Plaintiff-Relator Michael Gill